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10 UNITED STATES BANKRUPTCY COURT
11 FOR THE EASTERN DISTRICT OF CALIFORNIA

12 In Re:) Case #: 09-43426-C-7
13) DC No.: KB-1
14 JUNE DEANNA GIBSON,)
15) MOTION FOR ORDER
16 Debtor.) ABANDONING PROPERTY
17) OF THE ESTATE
18)
19) DATE: February 2, 2010
20) TIME: 9:30 A.M.
21) DEPT.: C
22) COURTROOM: 35
23)
24) Local Rule: 9014-1(f)(2)
25)
26)
27)
28)

TO THE HONORABLE JUDGE KLEIN:

JUNE DEANNA GIBSON, debtor, by and through his attorney, KEN BAKER,
respectfully represents:

1. On October 28, 2009, debtor filed a petition under Chapter 7 of the United States
Bankruptcy Code. Thomas A. Aceituno has been appointed Chapter 7 Trustee.
2. Debtor owns Sacramento Marble & Stone, a natural stone sales business described
in Question 18 of the Statement of Financial Affairs. Request is hereby made that the court
take judicial notice of the Statement of Financial Affairs of the filed Chapter 7 petition.

1 3. The Debtor has the inventory and office equipment of the business listed in
2 Question 28 and Question 30 of Schedule B of her petition. Trustee Thomas A. Aceituno has
3 requested an Order Abandoning debtor's interest in the business to limit potential liability.
4

5 4. The assets of the business, as listed on Schedule B of the petition, have a
6 scheduled value of \$21,593.00. The assets were claimed exempt pursuant to CCP Sec.
7 703.140(b)(5) and (6) in the amount of \$21,593.00. Request is hereby made that the Court
8 take judicial notice of Schedule B and Schedule C of the petition filed October 28, 2009.
9

10 5. There is no equity in said personal property realizable for the benefit of the
11 Chapter 7 Trustee and the estate. The property is inconsequential to the estate.
12

13 6. Counsel for debtor has requested an Order Shortening Time.
14

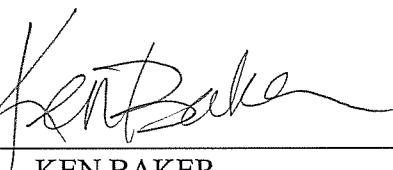
15 WHEREFORE, following Notice and Hearing, debtor, by and through her attorney,
16 prays for an Order of this Court as follows:
17

18 1. For an Order Compelling Thomas A. Aceituno, Chapter 7 Trustee, to abandon
19 any and all interest he may hold as Chapter 7 Trustee in the business of debtor which is
20 known as Sacramento Marble and Stone, Rancho Cordova, California 95742 and the
21 business assets as listed in Schedule B of the Chapter 7 petition; and
22

23 2. For such other and further relief as this Court may deem just and proper.
24

25 DATED: December 21, 2009
26

27 LAW OFFICES OF KEN BAKER
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29 BY: 
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31 KEN BAKER
32 Attorney for Debtor
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